

UNITED STATES BANKRUPTCY COURT
EASTERN DIVISION, DISTRICT OF MASSACHUSETTS

In re:		Chapter 7 Case
Romulo A. Rodrigues-Aguiar,		Case No. 15-12640-MSH
Debtor		
Keila Maria Rodriguez,	Plaintiff,	
v.		ADVERSARY PROCEEDING
Romulo A. Rodrigues-Aguiar,		No. <u>15-01234</u>
Defendant		

CERTIFICATION UNDER RULE 26(f) AND DISCOVERY PLAN
AND MOTION FOR APPROVAL THEREOF

Pursuant to Fed. R. Civ. P. 26(f), Fed. R. Bankr. P. 7026, the parties, through their undersigned counsel, hereby certify as follows:

- 1) The Rule 26(f) Conference was held between counsel for the parties by email continuing through the date hereof.
- 2) All parties will serve their Rule 26(a) disclosures within 31 days of the date the Court approves this Certification and Discovery Plan, if not already served.
- 3) The parties will conduct discovery regarding the claims and defenses included in the pleadings, and request until June 30, 2016, for completion of discovery. The parties do not propose that discovery be conducted in phases or be limited, other than objections brought in the ordinary course. The parties do not propose any changes in the limitations on discovery imposed under the applicable Federal Rules of Civil Procedure, Federal Rules of Bankruptcy Procedure and Local Bankruptcy Rules for the United States Bankruptcy Court in the District of Massachusetts.
- 4) The parties propose the date of August 31, 2016, for the joint pretrial memorandum, with dispositive motions filed at least seven days before that date.
- 5) At this time, the parties do not propose any requests for other orders by the Court under Rule 26(c) or Rule 16(b) or (c) of the Federal Rules of Civil Procedure. The parties reserve the right to make appropriate motions under Rule 26(c) of the Federal Rules of Civil Procedure during the course of discovery.

6) The parties estimate that the trial in this action will take one day to complete.

The parties respectfully move the court for approval of this Certification and Discovery Plan.

March 11, 2016

Respectfully submitted,
Romulo A. Rodrigues-Aguiar
By his Attorney,

Respectfully submitted,
Keila Maria Rodriguez, Plaintiff
By her Attorney,

/s/ *James P. Hayes*

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